

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

MARIA LOTOCZKY,

Plaintiff,

-v-

CONNECTED VENTURES, LLC,

Defendant.

SAKIS & SAKIS, PLC
Attorneys for plaintiffs
By: **Raymond S. Sakis** (P19843)
Jason R. Sakis (P59525)
Suite 123
3250 West Big Beaver Road
Troy, Michigan 48084
248.649.1160

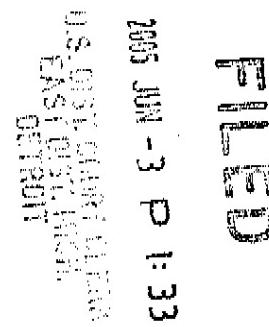
DRAPER & RUBIN, P.C.
By: David Draper (P43750)
Co-Counsel for Defendant
18580 Mack Avenue
Grosse Pointe Farms, Michigan 48236
313-885-6800

Case No. 04-74365

Honorable John Corbett O'Meara
Magistrate Judge R. Steven Whalen

KUBER LAW GROUP, P.C.

By: Douglas A. Kuber
Attorney for Defendant
575 Madison Avenue, 10th Floor
New York, New York 10022
212-813-2680



**PLAINTIFF COUNSEL'S MOTION
TO WITHDRAW FROM REPRESENTATION**

NOW COMES the plaintiff, MARIA LOTOCZKY, through her attorneys, SAKIS & SAKIS, and for the law firm of Sakis & Sakis, states as follows:

SAKIS & SAKIS, P.L.C.
Attorneys at Law
3250 W. Big Beaver Rd., Ste. 123
Troy, MI 48084
Telephone: (248) 649-1160
Facsimile: (248) 637-9737

1. The facts recited herein demonstrate that the attorney/client relationship in this case has deteriorated such that the plaintiff refuses to communicate with the law firm of Sakis & Sakis.

2. A letter was sent to the plaintiff along with Defendant's First Set of Interrogatories and Requests for Admissions along with an explanation indicating that she must answer the requests within a timely fashion. The aforementioned letter and materials were sent to her on April 20, 2005. (Exhibit 1).

3. After receiving no indication of forthcoming answers or documents, a call was placed to the plaintiff by the law firm of Sakis & Sakis on May 11, 2005 to remind her of the legal duty to return timely answers and documents so that they could be properly returned over to the defendant. During that conversation, the plaintiff acknowledged her obligation and promised to return the materials forthwith to the law firm of Sakis & Sakis.

4. In addition to the phone call made by Sakis & Sakis on May 11, 2005, a letter was mailed to the plaintiff reminding her of the importance of returning the desired materials and the adverse impact her refusal to comply would have upon her case. (Exhibit 2).

5. Due to the tardiness of the necessary answers and documents, a one week extension to file a response to the defendant's discovery requests was graciously granted by opposing counsel, Douglas A. Kuber - a copy which was provided to the plaintiff. (Exhibit 3).

6. Ms. Lotoczky failed to fulfill her duty of providing answers to the Defendant's Interrogatories, Requests for Production of Documents, and Requests for Admissions on or before the deadline of May 16, 2005, or the extended deadline of May 23, 2005.

7. A certified letter was subsequently sent to the plaintiff confirming the fact that her answers had not been received by the law firm of Sakis & Sakis. (Exhibit 4).

8. Plaintiff has since refused to communicate and/or cooperate with her attorneys.

9. Sakis & Sakis can only take such failures to provide the requested items in a timely manner as an indication that either the plaintiff does not intend to pursue her claim, or alternatively, that she does not intend to communicate with the firm of Sakis & Sakis.

10. Due to the apparent lack of cooperation and the deterioration of the attorney/client relationship in this case, Sakis & Sakis can no longer effectively represent Ms. Lotoczky.

11. For these reasons, plaintiff's counsel is requesting that it be permitted to withdraw from representation.

WHEREFORE, the law firm of Sakis & Sakis respectfully requests that it be permitted to withdraw from representation in this particular matter.

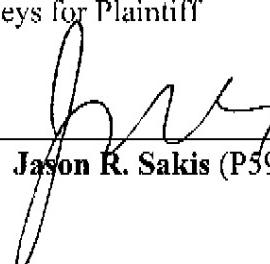
SAKIS & SAKIS, P.L.C.
Attorneys at Law

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Telephone: (248) 649-1160
Facsimile: (248) 637-9737

DATED: June 2, 2005

SAKIS & SAKIS, PLC
Attorneys for Plaintiff

By:


Jason R. Sakis (P59525)

SAKIS & SAKIS
ATTORNEYS AND COUNSELORS
Professional Limited Liability Company
3250 West Big Beaver Road, Suite 123
Troy, Michigan 48084
Tel: (248) 649-1160 Fax: (248) 637-9737

Jason R. Sakis
E-mail: jasonsakis@sakislaw.com

www.sakislaw.com

April 20, 2005

Maria Lotoczky
3649 Karen Parkway, Ste. 301
Waterford, Michigan 48328

Re: Maria Lotoczky v. Connected Ventures, LLC
Case No. 04-74365

Dear Ms. Lotoczky:

Please find enclosed Defendant's First Set of Requests for Admissions to Plaintiff. Defendant's First Set of Requests for Production of Documents to Plaintiff and Defendant's First Set of Interrogatories to Plaintiff. regarding the above referenced matter.

Please answer and provide the requested documents to the best of your ability and return to our office as soon as possible in the self addressed stamped envelope provided..

Thank you for your attention to this matter.

Respectfully,

SAKIS & SAKIS, PLC
Raymond S. Sakis

Enclosure



SAKIS & SAKIS
ATTORNEYS AND COUNSELORS
Professional Limited Liability Company
3250 West Big Beaver Road, Suite 123
Troy, Michigan 48084
Tel: (248) 649-1160 Fax: (248) 637-9737

Jason R. Sakis
E-mail: jasonsakis@sakislaw.com

www.sakislaw.com

May 11, 2005

Maria Lotoczky
650 Red Oak Lane
Rochester, Michigan 48307

Re: Maria Lotoczky v. Connected Ventures, LLC
Case No. 04-74365

Dear Ms. Lotoczky:

This will confirm that your answers to the Defendant's discovery requests are long overdue. As we mentioned in the previous letter and on your voicemail, it is imperative that you provide us with your answers as soon as possible. They are due with the Court on May 16, 2005. If the requests for admissions are not answered they are deemed to be admitted, so it is very important that you answer them.

Thank you for your assistance.

Respectfully,

SAKIS & SAKIS, PLC

Jason R. Sakis

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SAKIS & SAKIS
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Jason R. Sakis
E-mail: jason.sakis@sakislaw.com

www.sakislaw.com

May 16, 2005

VIA FAX AND FIRST CLASS MAIL
212.813.2681

Douglas A. Kuber, Esq.
Kuber Law Group
575 Madison Avenue, 10th Floor
New York, New York 10022

Re: Maria Lotoczky v. Connected Ventures, LLC
Case No. 04-74365

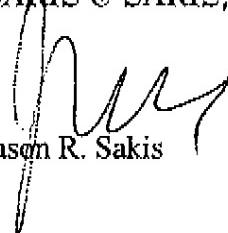
Dear Mr. Kuber:

This will confirm our telephone conversation wherein you granted me a one week extension to file a response to the Defendant's Request for Admissions. My client's failure to timely provide me with her answers, after having been sent two letters requesting same, has forced me to make this request.

Your professional courtesy is greatly appreciated.

Respectfully,

SAKIS & SAKIS, PLC


Jason R. Sakis

cc: Maria Looczky

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Jason R. Sakis
E-mail: jason@sakislaw.com

www.sakislaw.com

May 18, 2005

VIA CERTIFIED MAIL

Maria Lotoczky
650 Red Oak Lane
Rochester, Michigan 48307

Re: Maria Lotoczky v. Connected Ventures, LLC
Case No. 04-74365

Dear Ms. Lotoczky:

This letter will confirm that you have failed to provide us with answers to the defendant's interrogatories, requests for documents and requests for admissions. As you know, your case will be adversely affected by the failure to answer those questions.

Respectfully,

SAKIS & SAKIS, PLC


Jason R. Sakis

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| Total Postage & Fees | \$ | |

Sent To: **MARIA LOTOCZKY**
Street, Apt. No.,
or PO Box No.
City, State, ZIP+4
650 RED OAK LANE
ROCHESTER, MI 48307

PS Form 3800, June 2002 See Reverse for Instructions

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

MARIA LOTOCKY,

Plaintiff,

-v-

CONNECTED VENTURES, L.L.C.,

Case No. 04-74365

Honorable John Corbett O'Meara
Magistrate Judge R. Steven Whalen

Defendant.

SAKIS & SAKIS, PLC

Attorneys for plaintiffs

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Co-Counsel for Defendant
18580 Mack Avenue
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313-885-6800

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FILED
CLERK'S OFFICE
U.S. DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
DETROIT, MI
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NOTICE OF HEARING

TO: Plaintiff

Please take notice that Plaintiff's Motion To Compel will be brought on for hearing at a date and time to be set by the Court.

DATED: June 2, 2005

SAKIS & SAKIS, PLC
Attorney for plaintiff

By: _____
Jason R. Sakis (P59525)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

MARIA LOTOCZKY,

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-v-

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Defendant.

Case No. 04-74365

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Attorney for Defendant

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DRAPER & RUBIN, P.C.

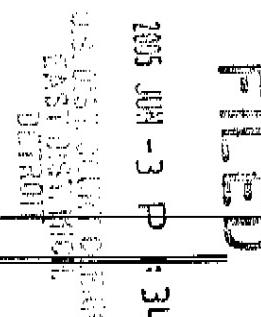
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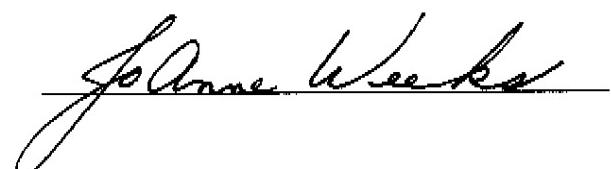
313-885-6800



CERTIFICATE OF SERVICE

The undersigned hereby avers and affirms that a copy of *Plaintiff Counsel's Motion to Withdraw From Representation, Notice of Hearing and Certificate of Service* were served upon the plaintiff at the address listed below, on June 2, 2005, via first class mail:

Maria Lotoczky
650 Red Oak Lane
Rochester, Michigan 48307



**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

MARIA LOTOCZKY,

Plaintiff,

-V-

CONNECTED VENTURES, LLC,

Defendant,

Case No. 04-74365

Honorable John Corbett O'Meara
Magistrate Judge R. Steven Whalen

SAKIS & SAKIS, PLC

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Co-Counsel for Defendant

18580 Mack Avenue

Grosse Pointe Farms, Michigan 48236

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The undersigned hereby avers and affirms that a copy of *Plaintiff Counsel's Motion to Withdraw From Representation, Notice of Hearing and Certificate of Service* were served upon defense counsel at the address listed below, on June 2, 2005, via first class mail.

Douglas A. Kuber
Attorney for Defendant
575 Madison Avenue, 10th Floor
New York, New York 10022

Solanne Weeks